

## **Comments on State Route 55 Improvement Project**

### Clarification on Purpose of Comments

Note that the comments that EPA is currently providing on the analysis is not a concurrence on the conformity analysis, but our thoughts on the methods proposed to be included in the final project level conformity analysis. To be consistent with 40 CFR 93.123(c), the final conformity analysis must clearly define a project for the conformity finding, “and may be performed only after the major design features which will significantly impact concentrations have been identified” (40 CFR 93.123(c)(2)). One project must be chosen before the analysis can be completed. Therefore, the project alternative, which is consistent with the project included in the RTP/TIP must be chosen and reflected in the qualitative analysis that is finally submitted to the interagency workgroup. At this point, EPA would review it and provide our final comments

### **PM2.5 AND PM10 HOT-SPOT METHODOLOGY –**

#### **Types of Emissions Considered/Analysis Method – Pages 6 -7**

The analysis correctly includes the use of PM2.5 reentrained road dust in the emissions method. However the references supporting this should be clarified. First, after the following statement on page 6 “For PM2.5, road dust emissions are only to be considered in hot-spot analyses if the EPA or the State air agency has made a finding that such emissions are a significant contributor to the PM2.5 air quality problem (40 CFR 93.102(b)(3)).” The document should reference that the 2007 South Coast PM2.5 SIP which identifies reentrained road dust as significant by including it in the area’s emission budgets. The document also indicates that Chapter 13.2 of AP-42 will be used. The document should include a reference to the January 2011 version of AP-42 in the References section of the analysis. (page 14)

The analysis indicates that the EMFAC2007 model was run for both the opening year 2020 and build-out year 2040. However, to be consistent with the EPA 2006 Hot Spot Guidance, the analysis needs to justify why these years are expected to have the peak emissions. (See the qualitative hot-spot guidance, p. 18, “4.2 What should be documented for a qualitative hot-spot PM2.5 or PM10 hot-spot analysis?”)

#### **Daily Vehicle Emission Changes Due to the Proposed Project**

On page 9, the document presents results showing that implementation of the proposed project would have a very small impact on the *regional* PM2.5 and PM10 emissions; however it’s not clear over what geographic area these emissions were calculated. Note that emissions within the entire South Coast Air Basin nonattainment area are too large an area to examine the hot spot impacts of the project. The definition of a hot-spot analysis is “an estimation of likely future localized pollutant concentrations ... [it] assesses impacts on a scale smaller than the entire nonattainment or maintenance area...” Please clarify if the geographic area is the immediate area around the project under analysis.